

EXHIBIT A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

CRYSTAL BOLDUC,

Plaintiff,

vs.

AMAZON.COM INC.,

Defendant.

Civil Action No. 4:22-cv-615-ALM

DECLARATION OF SHEREEF JOHN MIKHAIL

I, Shereef John Mikhail, declare as follows:

1. I am the Sr. Manager – DSP Acquisition at Amazon.com, Services LLC (“Amazon”) and have been in this position since May 9, 2022. I am over the age of 18 and competent to make this Declaration. The statements contained in this Declaration are based on my personal knowledge and a review of Amazon’s business records. If called and sworn as a witness, I would and could testify competently and truthfully to the matters set forth herein.

2. Amazon is incorporated in Delaware and has its headquarters in Washington.

3. Amazon’s Delivery Service Partner (“DSP”) Program was created in 2018. Through the DSP Program, Amazon contracts with individual businesses—called DSPs—to deliver packages within the communities they serve.

4. The DSP application process is lengthy, competitive, and highly selective. In 2021, Amazon received about 21,000 DSP applications and accepted only about 650 applicants into the DSP Program. In 2022, Amazon received about 12,000 DSP applications and accepted only about 190 applicants into the DSP Program.

5. To assist individuals with the application process to become DSP owners, Amazon has created a Frequently Asked Questions (“FAQs”) webpage, and related linked resources, that accurately identify the requirements and application process for becoming a DSP owner. The FAQs can be found at <https://logistics.amazon.com/marketing/fag> and the linked resources, including a program brochure, resume and application tips sheet, and on-site interview preparation sheet can be found at <https://logistics.amazon.com/marketing/resources>.

6. To apply to become DSP owners, individuals must first submit an online application that provides information about previous work experience, leadership, financial health, and community involvement. The online application also requires the selection of the applicants’ preferred geographic location where they would seek to operate as DSP owners if ultimately selected.

7. In addition to the online application, an individual seeking to become a DSP owner must provide documentation demonstrating access to \$30,000 in liquid assets, as well as pass a credit check, background screening, and motor vehicle record check.

8. If an applicant is selected to progress for further consideration after DSP applications have been submitted, the applicant will be required to participate in a recorded screening interview, and then a final round of interviews, where applicants will be required to submit business plans.

9. If an applicant successfully makes it through the final round of interviews, then the applicant will have the opportunity to discuss location and financials before a final decision is made.

10. If the applicant selected a geographic preference in which Amazon has an opening, then the applicant can be given an offer to become a DSP owner.

11. If the applicant selected a geographic preference in which Amazon does not have an opening, the applicant will be asked to join the Future DSP program, until an opening becomes available, and an offer can be made to become a DSP owner. Acceptance into the Future DSP program does not guarantee an applicant will become a DSP owner; some participants in the Future DSP program may never become DSP owners.

12. Amazon does not consider an applicant's race, or any other protected classification, or provide preferential treatment based on race in determining who to accept into the DSP Program.

13. Since the development of the DSP Program, Amazon has introduced a number of different assistance programs to provide additional help to certain individuals who qualify to become DSP owners.

14. For example, in 2018, Amazon implemented the Veteran's grant program which provided \$10,000 grants to eligible veterans who became DSP owners.

15. In 2020, Amazon launched the diversity grant program which provides a monetary stipend of \$10,000 to eligible Black/African American, Hispanic/Latinx, and/or Native American/Indigenous DSPs.

16. Further, in 2022, Amazon created the Road to Ownership Program which provides \$30,000 grants to eligible employees of DSPs who are selected for and successfully complete the Road to Ownership Program and become DSP owners.

17. In regards to the diversity grant program, since the grant is provided to DSP owners, rather than to applicants, the \$10,000 stipend has no effect on the application process to become a DSP owner and cannot be used to supplement and/or replace an applicant's requirement to prove access to \$30,000 in liquid assets during the application process. Likewise, potential eligibility for the grant program is not considered during the application process to become a DSP owner.

18. The grant is provided to eligible DSP owners who are accepted into the DSP program to assist them with startup costs associated with launching a small business after they have become DSP owners. Applicants who are asked to join the Future DSP program are ineligible for the grant program until and unless they actually launch as DSP owners.

I declare under penalty of perjury under the laws the United States that the foregoing is true and correct.

Executed on this 24th day of March 2023, at Glen Rock, NJ.

/s/ 